

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

4DD HOLDINGS, LLC, and)	
T4 DATA GROUP, LLC,)	
)	
<i>Plaintiffs,</i>)	
v.)	
)	Case No. 15-945C
UNITED STATES,)	
)	Senior Judge Eric G. Bruggink
<i>Defendant,</i>)	
)	
and)	
)	
IMMIX TECHNOLOGY, INC.,)	
)	
<i>Third-Party Defendant.</i>)	
_____)	

CORRECTED JOINT MOTION TO AMEND CASE SCHEDULE

Pursuant to Rules 6(b) and 7(b) of the Rules of the United States Court of Federal Claims, plaintiffs, 4DD Holdings, LLC and T4 Data Group, LLC, and defendant, the United States, jointly move to amend the case schedule to extend the deadline by thirty (30) days, to and including November 14, 2018, for plaintiffs to file their motion, if any, regarding plaintiffs' allegations of spoliation, as contemplated in the Court's August 30, 2018 order. *See* Order, Aug. 30, 2018, ECF No. 123. The current deadline for such a motion is October 15, 2018. This proposed extension would not change any of the other dates in the current case schedule. The Parties are actively meeting and conferring on a variety of topics related to discovery and case scheduling, including plaintiffs' allegations of spoliation, and respectfully request to amend the deadline for plaintiffs' filing accordingly.

Respectfully submitted,

/s/ Edward H. Meyers
Edward H. Meyers
Counsel of Record

Pat A. Cipollone, P.C.
Robert B. Gilmore
Phillip J. O'Beirne
STEIN MITCHELL CIPOLLONE BEATO & MISSNER LLP
901 15th Street, NW Suite 700
Washington, D.C. 20036
Telephone: (202) 737-7777
Facsimile: (202) 296-8312
Email: emeyers@steinmitchell.com

October 15, 2018

Attorneys for Plaintiffs

JOSEPH H. HUNT
Assistant Attorney General

ROBERT E. KIRSCHMAN, JR.
Director

/s/ Elizabeth M. Hosford
ELIZABETH M. HOSFORD
Assistant Director

/s/ John J. Todor
JOHN J. TODOR
Senior Trial Counsel
Commercial Litigation Branch
U.S. Department of Justice
Civil Division
P.O. Box 480
Ben Franklin Station
Washington, D.C. 20044
Tel: (202) 616-2382
Fax: (202) 514-8640
Email: john.todor@usdoj.gov

October 15, 2018

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that on October 15, 2018, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the ECF system.

/s/ Edward H. Meyers